

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SHELLEY L. STANGLER, P.C.
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Attorney for Plaintiffs

MOHAMMAD R. RAHAMI,
MOHAMMAD K. RAHAMI, JR., and
MOHAMMAD Q. RAHAMI,

Plaintiffs,
vs.

THE CITY OF ELIZABETH, THE
ELIZABETH POLICE DEPARTMENT,
OFFICER J. CORREIA, OFFICER L.
BOONE, OFFICER JOSEPH WASSELL,
OFFICER HECTOR CABO, DETECTIVE
V. TROPEANO, SERGEANT BURNS,
LIEUTENANT JOHN BASTARDO,
CHIEF OF POLICE RONALD SIMON,
POLICE DIRECTOR JAMES
COSGROVE, JAMES DEAN
MCDERMOTT, JOHN DOES 1-5 and ABC
ENTITIES 1-5,

Defendants.

CIVIL ACTION

Civ No: 2:11-cv-01953-DMC-JAD

NOTICE OF MOTION TO
BE RELIEVED AS COUNSEL

(FILED UNDER SEAL)

TO:

Mr. Mohammad R. Rahami
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Department, Chief Simon and Director Cosgrove

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Attorneys for Officer Harry de Cabo

Ascione & Wilson
226 St. Paul Street
Westfield, NJ 07090
Attn: Janyce M. Wilson, Esq.
Attorneys for Officer L. Boone

PLEASE TAKE NOTICE that on Monday, **March 2, 2015**, at 9:00 o'clock in the forenoon or as soon thereafter as Motions may be heard, the undersigned attorneys for plaintiffs shall apply to Magistrate Judge Joseph A. Dickson, United States District Court, Newark Vicinage, 50 Walnut Street, Newark, New Jersey 07102, for an Order relieving the undersigned and the law firm of Shelley L. Stangler, P.C. as counsel for plaintiffs.

PLEASE TAKE FURTHER NOTICE that Petitioners' counsel shall rely upon the annexed Certification and Brief in support of said Motion, the Certification is filed under seal to protect the patient/client from prejudice.

PLEASE TAKE FURTHER NOTICE that the movant waives oral argument unless this Motion is opposed.

PLEASE TAKE FURTHER NOTICE that no trial date has been assigned to this case.

SHELLEY L. STANGLER, P.C.
Attorneys for Plaintiff

By:

A handwritten signature in black ink, appearing to be 'S. Stangler', written over a horizontal line.

SHELLEY L. STANGLER, ESQ.

Dated: February 3, 2015